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**Cc:** [Reichgott, Christine](#); [Wright, Wendy](#)  
**Subject:** FW: CENWP-PM-E-15-02: Caspian Tern Nesting Habitat Management East Sand Island Draft EA - EPA Comments  
**Date:** Tuesday, March 17, 2015 6:04:17 PM

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District Engineer, US Army Corps of Engineers, Portland District  
Attn: CENWP-PM-E-/ Paul Schmidt  
P.O. Box 2946  
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**Subject:** Caspian Tern Nesting Habitat Management East Sand Island Draft EA, 3/3/15  
EPA Region 10 Project Number 15-0026-COE

Dear Mr. Schmidt:

The U.S. Environmental Protection Agency has reviewed the Caspian Tern Nesting Habitat Management East Sand Island Draft Environmental Assessment, dated March 3, 2015. We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We appreciate receiving notification of availability of the EA. Our comments and recommendations are provided below:

- EA, Page 31: The EA indicates there have been two incidents (in 2011 and 2013) of entanglement of California brown pelicans in dissuasion materials. In the Final EA, we recommend addressing this issue in more detail. Indicate what measures would be taken to prevent entanglement of brown pelicans (or other species), and how it would be remedied if it does occur.
- EA, Pages 9, 40: We note (p. 9) that predation by gulls, great horned owls, and raccoons has been an issue at several Corps constructed islands and that a depredation permit has been obtained from USFWS for predator control. In the Final EA we recommend including more information about the provisions of the depredation permits, predation methods used, and species covered/affected by the permits. Also, clarify whether this same information applies to predator management discussed on page 40 of the EA, which is occurring at interior sites in Oregon and California.
- EA, Page 40: We are concerned that due to drought, many potential alternative nesting locations for Caspian terns will not be suitable. It is unclear whether or not there is actually enough alternative habitat that would be both suitable and permissible for the Caspian terns. Please provide more information to clarify availability of suitable habitat with expected drought conditions.
- EA, Page 16: In 2011, a complete breeding failure occurred on East Sand Island for the Caspian terns – no chicks were produced. The EA does not explain why this failure occurred, whether it could potentially re-occur due to proposed management actions and, if so, what would be done in response to this situation. We recommend this information be provided in the Final EA.

Thank you for the opportunity to provide comment. If you have questions or would like to discuss these issues, please feel free to contact me at (206) 553-2966 or via electronic mail at [somers.elaine@epa.gov](mailto:somers.elaine@epa.gov).

Sincerely,  
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